



August 11, 2014

VIA EMAIL:

regs.comments@occ.treas.gov
Docket ID OCC-2014-0015

regs.comments@federalreserve.gov
Docket No. 1492

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street, SW
Suite 3E-218, Mail Stop 9W-11
Washington, DC 20219

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: Annual Stress Test—Schedule Shift and Adjustments to Regulatory Capital Projections
Amendments to the Capital Plan and Stress Test Rules

Ladies and Gentlemen:

We appreciate the opportunity to comment on the proposed rules (the Rules) issued by the Office of the Comptroller of the Currency and the Board of Governors of the Federal Reserve System (the Agencies) that would shift the timing of the annual Dodd-Frank Act Stress Testing (DFAST) process.

First Tennessee Bank National Association is a regional bank with \$24 billion in total assets as of June 30, 2014. Our 4,200 employees provide financial services through more than 170 bank locations, primarily in and around Tennessee. In addition, our FTN Capital Markets division provides fixed income trading, investments accounting and other related services to thousands of community oriented U.S. depository institutions.

We support the shift in timing of the DFAST process to the end of the calendar year (December 31 "as of" date) with a July 31st submission deadline for the 2016 DFAST cycle. Further, we would highly encourage the Agencies to consider enacting this change for the upcoming 2015 process. The shift in timing would greatly benefit our institution by moving the process to a time of year when there are fewer demands on our staffing resources. Specifically:

- The current process coincides with year-end close and financial reporting as well as two major holidays. A significant portion of our staff and senior management team are dedicated to completing their close and reporting duties during this time. Pushing the DFAST schedule back by three months would significantly free up resources to work on stress testing activities.

First Horizon National Corporation
165 Madison Avenue, Memphis, TN 38103

FIRST TENNESSEE

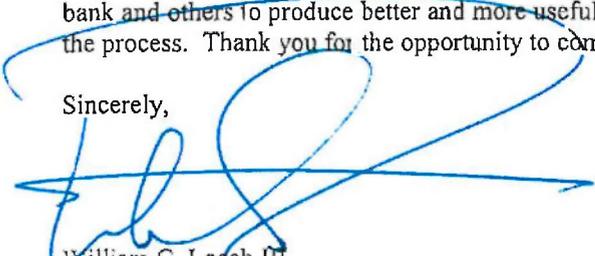
FIRST HORIZON

FTN FINANCIAL

- The addition of an extra month to complete the submission will allow for more thorough review, challenge, and documentation of the submission and process by the stress testing team. The extra month will also provide more time for Internal Audit and Model Validation to perform their evaluations.
- Shifting the process would enable us to better align communication of stress testing results to our Board of Directors and related subcommittees with existing Board meetings. This timing shift and additional time to complete the submission will allow for more communication with the Board and time to fully implement any changes they recommend.

In summary, we support the shift in timing under the Rules and believe that the regulatory changes will allow our bank and others to produce better and more useful stress testing results and increase governance and controls around the process. Thank you for the opportunity to comment on the proposed rules.

Sincerely,



William C. Losch III
Executive Vice President & Chief Financial Officer
First Horizon National Corporation